

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DINA CAPITANI)
)
Plaintiff)
)
v.) Civil Action No. 3:19-cv-00120
)
WORLD OF MINIATURE BEARS, INC.,)
individually, and d/b/a MINIBEARGEMS,)
and MINI BEAR GEMS, and)
MINIBEARSGEMS & GIFTS, INC.,)
individually, and d/b/a MINIBEARGEMS)
and MINI BEAR GEMS)
)
Defendants.)

**DEFENDANTS' MOTION IN LIMINE TO EXCLUDE EVIDENCE OF BUSINESS LOSS
DAMAGES UNDISCLOSED IN DISCOVERY**

COMES NOW, the Defendants, by and through counsel, and hereby move this Court to prohibit Plaintiff from making any reference to or introducing any evidence related to business loss damages that were not disclosed in discovery. For the reasons further explained and set forth in the accompanying Memorandum of Law, Defendants World of Miniature Bears, Inc. and MiniBears Gems & Gifts, Inc. requests that the Court grant their motion to exclude business loss damages.

Respectfully submitted,

/s/ Desireé J.C. Goff
John A. Beam, III (BPR #11796)
Desireé J.C. Goff (BPR # 31136)
Equitus Law Alliance, PLLC
709 Taylor Street

P.O. Box 280240
Nashville, Tennessee 37228
Telephone: (615) 251-3131
Facsimile: (615) 252-6404
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2020, I electronically filed the Motion in Limine to Exclude Evidence of Business Loss Damages Undisclosed in Discovery with the Clerk of this Court using the CM/ECF system which will automatically send email notification of such filing to the following parties who are CM/ECF participants:

Autumn L. Gentry, Esq.
Dickinson Wright, PLLC
424 Church Street, Suite 800
Nashville, Tennessee 37219
Attorney for Plaintiff Capitani

/s/ Desireé Goff
Desireé Goff